	D STATES DISTRICT COURT ERN DISTRICT OF MISSOURI EASTERN DIVISION	MAR 2 1 2012
UNITED STATES OF AMERICA,	)	ST LOUIS
Plaintiff,	)	
v.	4:12 CP12 WOO9	F14CE J
JONATHAN D. McKEE,		
Defendant.	)	
	INFORMATION	

The United States Attorney charges that:

1. Beginning in 2007 and continuing into early 2011 defendant Jonathan D. McKee was an attorney licensed to practice law in the State of Missouri.

**COUNT ONE** 

- 2. As an attorney, he represented clients in many aspects of the general practice of law.
- 3. Many of his clients were plaintiffs where he was retained on a contingent fee basis.
- 4. As such, McKee would represent clients and, if he successfully prevailed, he would receive a percentage of the gross settlement, as his fee, pay medical bills and other expenses, and send the remainder to his client.
- 5. Generally, these clients were suing individuals or businesses who had insurance policies in case of such accidents, negligence, or contract disputes.

- 6. If the defendant McKee prevailed on behalf of his clients the insurance company would mail a check to McKee in St. Louis County, Missouri. These checks were generally payable to McKee and his client (by name), deposited into a McKee bank account, and then distributed appropriately to his client and pay medical and other expenses with McKee retaining the remainder as his contingent fee.
- 7. However, on many occasions, McKee would keep the entire check upon receipt rather than pay his client and expenses.
- 8. During the above time frame defendant Jonathan D. McKee failed to pay clients and expenses and, in other words, defrauded his clients and others in the amount of in excess of \$400,000.00.
  - On or about June 4, 2009 in St. Louis County, in the Eastern District of Missouri,
    JONATHAN D. McKEE,

the defendant herein, for purpose of executing the above scheme and artifice to defraud and attempting to do so, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly cause to be placed in a United States Post Office or authorized depository for mail matter, an envelope from Nationwide Insurance Company of America, 1100 Locust, Des Moines, Iowa, 50391, containing a corporate check in the amount of \$11,500.00, dated June 4, 2009, payable to D. B. and Jonathan McKee, her attorney, mailed to Granat and McKee (Jonathan McKee), 8505 Delmar Blvd., Suite E., St. Louis, Missouri 63124-2112.

In violation of Title 18, United States Code, Sections 2 and 1341.

Respectfully submitted,

RICHARD G. CALLAHAN United States Attorney

MICHAEL W. REAP #9156 Assistant United States Attorney 111 S. 10<sup>th</sup> Street, 20<sup>th</sup> Floor St. Louis, MO 63102 (314) 539-2200

UNITED STATES OF AMERICA	)
EASTERN DIVISION	)
EASTERN DISTRICT OF MISSOURI	)

I, Michael W. Reap, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

MICHAEL W. REAP, #9156

Subscribed and sworn to before me this 2012.

CLERK, U.S. DISTRICT COURT

DEPUTY CLERK